

Form ADV Part 2A  
Investment Advisor Brochure

# *SIGNATURE INTELLIGENT PORTFOLIOS*

This Form ADV Part 2A (Investment Advisor Brochure) provides information about the qualifications and business practices of Signature Intelligent Portfolios, LLC ("SIP"). SIP's Privacy Notice and Business Continuity Program is attached is attached to the end of this document.

If you have any questions about the contents of this brochure, please contact us at 310-712-2323 or [contactus@seia.com](mailto:contactus@seia.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Registration is mandatory for all persons meeting the definition of investment advisor and does not imply a certain level of training.

Additional information about SIP also is available on the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Date of Brochure as Last Revised: August 25, 2015

Securities offered through Signator Investors, Inc., Member FINRA, SIPC, 2121 Avenue of the Stars, Suite 1600, Los Angeles, CA 90067 (310) 712-2323. Signature Financial Services, LLC is a wholly owned subsidiary of Signature Estate & Investment Advisors, LLC, and its investment advisory services are offered independent of Signator Investors, Inc. and any subsidiaries or affiliates.

# Material Changes to Investment Advisor Brochure

## **Summary of Material Changes**

The purpose of this section is to discuss only material changes since the last annual update of the Signature Intelligent Portfolios, LLC (“SIP”) Investment Advisor Brochure.

1. Signature Intelligent Portfolios, LLC is a new investment advisory firm and as such has no material changes to disclose.

Please review the full document SIP ADV 2A for further information associated with these changes.

**Delivery:** Within 120 days of our fiscal year end we will deliver our annual Summary of Material Changes if there have been material changes since the last annual updating amendment.

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## **Advisory Business**

### **Advisory Firm**

Signature Intelligent Portfolios, LLC is a registered investment advisory firm that provides automated, online investment management services to meet the needs of its clients.

Signature Intelligent Portfolios, LLC ("SIP") is a wholly owned subsidiary of Signature Estate & Investment Advisors, LLC® ("SEIA"), of which the principal owner is Brian D. Holmes. Both SIP and SEIA are Registered Investment Advisers under the Investment Advisers Act of 1940, as amended.

As of December 31, 2015, SIP manages \$0 of client assets.

### **Intelligent Portfolios Program**

SIP provides portfolio management services through Institutional Intelligent Portfolios™, an automated, online investment management platform sponsored by Schwab Wealth Investment Advisory, Inc. (the "Program" and "SWIA," respectively). Through the Program, we offer clients a range of investment strategies we have constructed and manage, each consisting of a portfolio of exchange traded funds ("ETFs") and a cash allocation to a sweep program at Charles Schwab Bank (the "Sweep Program"), which is further described below under **Charles Schwab Bank Sweep Program**. The client may instruct us to exclude up to three (3) ETFs from their portfolio. It should be noted that clients are not allowed to make trades in their Program accounts and restrictions on investments in specific securities may not be possible due to the inherent limitations of the Program. The Program is described in the Schwab Wealth Investment Advisory, Inc. Institutional Intelligent Portfolios™ Disclosure Brochure (the "Program Disclosure Brochure"), which is delivered to clients by SWIA during the online enrollment process.

The client's portfolio is held in a brokerage account opened by the client at SWIA's affiliate, Charles Schwab & Co., Inc. ("CS&Co"). SIP is independent of and not owned by, affiliated with, or sponsored or supervised by SWIA, CS&Co or their affiliates (together, "Schwab"). We have contracted with SWIA to provide us with the technology platform and related trading and account management services for the Program. This platform enables us to make the Program available to clients online and includes a system that automates certain key parts of our investment process (the "System"). The System includes an online questionnaire that helps us determine the client's investment objectives and risk tolerance and select an appropriate investment strategy and portfolio. Clients should note that we will recommend a portfolio via the System in response to the client's answers to the online questionnaire. The client may then indicate an interest in a portfolio that is one level less or more conservative or aggressive than the recommended portfolio, but we then make the final decision and select a portfolio based on all the information we have about the client. The System also includes an automated investment engine through which we manage the client's portfolio on an ongoing basis through automatic rebalancing and tax-loss harvesting (if the client is eligible and elects). Clients are eligible for these optional features as long as they meet certain account balance requirements set by the Program.

SIP, and not Schwab, is the client's investment adviser and primary point of contact with respect to the Program. We are solely responsible, and Schwab is not responsible, for determining the appropriateness of the Program for the client, choosing a suitable investment strategy and portfolio for the client's investment needs and goals, and managing that portfolio on an ongoing basis. SWIA's role is limited to

delivering the Program Disclosure Brochure to clients and administering the Program so that it operates as described in the Program Disclosure Brochure.

SIP does not receive a portion of a wrap fee for our services to clients through the Program. Clients do not pay brokerage commissions or any other fees to CS&Co as part of the Program. Schwab does receive other revenues in connection with the Program, as described below under ***Charles Schwab Bank Sweep Program*** and in the Program Disclosure Brochure.

### **Charles Schwab Bank Sweep Program**

The Sweep Program is a feature of the Program required by SWIA. Each investment strategy involves a cash allocation to the Sweep Program. The cash allocation will be a mandatory minimum of 4% of the account's value to be held in cash, and may be higher, depending on the chosen investment strategy and the amount of the cash allocation set for that investment strategy. Charles Schwab Bank, an FDIC-insured depository institution that is a Schwab affiliate, earns income on the Cash Allocation for each investment strategy, creating a potential conflict of interest for SWIA. Additional details regarding the Sweep Program are described further in the Program Disclosure Brochure.

### **Potential Conflicts of Interest**

SIP does not pay SWIA fees for its services in the Program so long as we meet certain conditions specified by SWIA in our agreement with them. We have a potential incentive to recommend or require that clients with accounts managed by our affiliates (but not enrolled in the Program) be maintained with CS&Co due to this arrangement. This arrangement is described in detail below under ***Brokerage Practices***.

## **Fees and Compensation**

### **Advisory Fees**

Fees are computed as an annualized percentage of assets under management including cash balances and accrued interest. Fees are negotiable and are based on the number and range of supplementary advisory and other services provided to clients who meet specific account balance requirements.

Fees are calculated on a tiered fee structure. The tiered schedule below shows the fee charged at certain asset levels in the client's portfolio:

<b><u>Portfolio Value Between</u></b>	<b><u>Per Annum Fee</u></b>
Less than \$20,000	No Fee
\$ 20,000 to \$ 249,999	0.25%
\$ 250,000 to \$ 499,999	0.35%
\$ 500,000 and over	0.45%

A tiered fee structure means that accounts are charged the applicable rate for assets at each level. For example, a client with a portfolio value of \$300,000 at quarter end is charged 0% on the first \$20,000, 0.25% on the next \$230,000 and 0.35% on the last \$50,000,

Clients who invest at least \$250,000 will have access to an investment consultation with a financial advisor to discuss their current asset allocation and whether it should be adjusted based on their risk level.

Clients who invest at least \$500,000 will have access to work with a financial advisor to develop a financial plan that takes into consideration their financial situation, investment goals and objectives. Additional fees may apply based on the scope and complexity of the planning required by the client.

The fees are payable quarterly in arrears. Fees begin accruing when accounts become linked to us or when funded. To allow for additional account setups, transfers, final strategy discussions, etc., at our discretion, SIP can delay the initial fee accrual date up to 45 days. Written agreement between the client and Financial Advisor is required for fee accrual date delays beyond 45 days. The first payment is assessed and due at the end of the first calendar quarter and will be assessed pro rata in the event the Agreement is executed at any time other than the first day of the current calendar quarter. Subsequent payments are due and will be assessed on the first day after the end of each calendar quarter based on the value of the account assets under supervision as of the close of business on the last business day of that quarter. Fees may be waived at our discretion, on the value of large deposits made shortly before the end of the quarter.

### **General Fee Disclosures**

Fees are automatically deducted from clients' accounts. Clients authorize the custodian holding client funds and securities to deduct SIP advisory fees from their managed accounts. The custodian will provide periodic account statements to the client. Such statements will reflect all fee withdrawals by SIP. It is the client's responsibility to verify the accuracy of the fee calculation. The custodian will not determine whether the fee is properly calculated.

As described in **Advisory Business**, clients do not pay fees to SWIA or brokerage commissions or other fees to CS&Co as part of the Program. Schwab does receive other revenues in connection with the Program, as described in the Program Disclosure Brochure. SIP' fees are not set or supervised by Schwab. Brokerage arrangements are further described below under **Brokerage Practices**.

### **Performance-Based Fees And Side-By-Side Management**

SIP does not charge performance-based fees. (A fee that is based on gains in the client account.)

### **Types of Clients and Account Minimums**

Clients eligible to enroll in the Program include individuals, IRAs and revocable living trusts. Clients that are organizations (such as corporations and partnerships) or government entities, and clients that are subject to the Employee Retirement Income Security Act of 1974, are not eligible for the Program. The minimum investment required to open an account in the Program is \$5,000. The Program Disclosure

Brochure describes related minimum required account balances for maintenance of the account, automatic rebalancing, and tax-loss harvesting.

## **Methods of Analysis, Investment Strategies**

SIP's Department of Internal Management and Economic Strategy ("DIMES") is responsible for creating investment strategies for the Program that consist of diversified portfolios of ETFs combined with a cash allocation in a single account pursuant to investment parameters provided by clients during the online enrollment process. Each investment strategy is designed to be consistent with a certain combination of investment return objectives and risk tolerances. Certain strategies are intended for taxable accounts and others for tax-deferred accounts. Certain strategies are intended for clients who are looking for a level of income generation. DIMES may at their own discretion add, remove, or change investment strategies used in the Program.

DIMES uses the principles found in Modern Portfolio Theory, proprietary research, and third-party research. Underlying this approach is:

- Strategic Macro Asset Allocation, which is based on asset class and style through the use of computer software models, based on capital market assumptions and modern portfolio theory principles.
- Tactical Micro Allocation, which is based on business cycle, global and domestic macro / micro-economic conditions and other potential event-driven opportunities.

DIMES analysis and investment selection are driven by a two-prong approach to filter the universe of ETFs for inclusion in the Program:

- Quantitative metrics focus on identifying potential investments with consistent, good risk-adjusted performance returns based on mathematical and statistical methods and analysis.
- Qualitative metrics focus on the "quality" of potential investments that meet the above quantitative standards. DIMES focuses on attributes of investments that cannot be directly captured by quantitative measurement.

## **Risk of Loss**

While the automated investing platform offered by the Program may offer many benefits for the client, including low cost and ease of use, clients should also be aware of the risks and limitations of using these types of automated tools. The algorithm employed by the Program to maintain clients' portfolios may rely on assumptions that could be incorrect or do not apply to your individual situation. For example, the algorithm may be programmed to use economic assumptions that will not react to shifts in the market. If the algorithm assumes that interest rates will remain low but, instead, interest rates rise, the algorithm's output will be flawed. In addition, the Program, like other investment programs, is designed to consider limited options. For example, the written parameters established by SWIA for the Program place limitations on the universe of ETFs that SIP may include in clients' portfolios (these parameters for inclusion in the Program are described in the Program Disclosure Brochure).

The Program Disclosure Brochure includes a discussion of various risks associated with the Program, including the risks of investing in ETFs, as well as risks related to the underlying securities in which ETFs invest. In addition, the Program Disclosure Brochure also discusses market/systemic risks, asset

allocation/strategy/diversification risks, investment strategy risks, trading/liquidity risks, and large investment risks.

### **Disciplinary Information**

SIP does not have any disclosure items.

An investment advisor must disclose material facts about any legal or disciplinary event that is material to a client's evaluation of the advisory business or of the integrity of its management personnel.

### **Other Financial Industry Activities and Affiliations**

SIP is not, but the Financial Advisors of the firm may be licensed as securities registered representatives and insurance agents. On average, the Financial Advisors dedicate approximately 85% of their time towards investment advisory activities; 5% securities brokerage; and 10% insurance.

The Financial Advisors of SIP, as Registered Representatives, are licensed with Signator Investors, Inc. ("SII"). SII is a general securities broker/dealer, registered with the Securities and Exchange Commission, and member of the Financial Industry Regulatory Authority. SII is a wholly-owned subsidiary of John Hancock U.S.A. ("JHUSA"). JHUSA is a diversified financial services company engaged in the design and sale of investment and insurance products. JHUSA is the US operating subsidiary of Manulife Financial Corp., (NYSE, MFC) based in Canada. The client is under no obligation to purchase securities recommended through us, SII, JHUSA, or other affiliated companies. SIP is independently owned, and is not owned by JHUSA or any of its affiliated companies.

The Financial Advisors of SIP may also be licensed as insurance brokers with Signature Comprehensive Insurance Services, LLC ("SCIS"), an affiliated company of SIP.

The Financial Advisors of SIP may also be licensed as insurance brokers with, and may transact business through several life, disability, and other insurance companies.

Financial Advisors may recommend securities, asset management, or insurance offered by JHUSA, its affiliates, or independent insurance companies. Financial Advisors of SIP, in their capacity as Registered Representative of SII, insurance brokers through Signature Comprehensive Insurance Services LLC ("SCIS") (for fixed insurance other than JHUSA), Signature Estate & Insurance Services LLC ("SEIS") (for JHUSA fixed insurance) or other approved insurance companies, are restricted to represent only products approved for sale through these entities. Other suitable investment products might be available through other broker/dealers or insurance companies. If clients purchase these products through us, we will receive the normal commissions or fees. Thus, a conflict of interest exists between our interests and those of advisory clients. The client is under no obligation to purchase securities or insurance products recommended, or to purchase products either through us, SII, JHUSA, SCIS, SEIS, or other affiliated companies. SIP is independently owned, and is not owned by JHUSA or any of its affiliated companies.

Financial Advisors of SIP may also act as Financial Advisors for Signature Estate & Investment Advisors, LLC ("SEIA") and/or Signature Investment Advisors, LLC ("SIA"). SIP, SEIA and SIA all offer investment



advisory services and have shared personnel. SIP provides services to clients referred by SEIA, its parent company. Financial Advisors may also act in other capacities as associated persons of SEIA and SIA, and would have additional disclosures if/when acting under SEIA or SIA. If a client were to receive services of SEIA or SIA, then the client would receive the SEIA or SIA disclosure document.

## **Code Ethics, Participation/Interest In Client Transactions, Personal Trading**

### **Code of Ethics**

SIP maintains a Code of Ethics. The Code of Ethics sets forth standards of conduct expected of advisory personnel; requires compliance with federal securities laws; and, addresses conflicts that arise from personal trading by advisory personnel. Clients may request a copy of the Code of Ethics.

### **Participation or Interest in Client Transactions**

Charles Schwab Investment Management, Inc. (CSIM), a Schwab affiliate, earns revenues from Exchange Traded Funds ("ETFs") held in Program accounts. CSIM may earn additional revenues from Schwab's proprietary ETFs held in Program accounts.

SIP is independent of and not owned by, affiliated with, or sponsored or supervised by Schwab, and does not receive any portion of this compensation.

### **Personal Trading**

At times the interests of SIP and/or its access persons correspond with our client's interests. We may invest in the same securities that are recommended to clients. SIP's policy is designed to avoid conflicts of interest with our clients. We will not violate our fiduciary responsibilities to our clients.

SIP and its access persons will keep records of all personal securities transactions whether done through the firm or not. SIP monitors its access persons' personal security transactions on an on-going basis.

## **Brokerage Practices**

### **Selection or recommendation of broker/dealers**

In addition to our portfolio management and other services, the Program includes the brokerage services of CS&Co, a broker-dealer registered with the Securities and Exchange Commission and a member of FINRA and SIPC. While clients are required to use CS&Co as custodian/broker to enroll in the Program, the client decides whether to do so and opens its account with CS&Co by entering into an account agreement directly with CS&Co. We do not open the account for the client. If the client does not wish to place his or her assets with CS&Co, then we cannot manage the client's account through the Program. As described in the Program Disclosure Brochure, SWIA may aggregate purchase and sale orders for ETFs across accounts enrolled in the Program, including both accounts for our clients and accounts for clients of other independent investment advisory firms using the Program.

## Soft Dollar Practices

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like us. Through Schwab Advisor Services, CS&Co provides us and our clients, both those enrolled in the Program and our clients not enrolled in the Program, with access to its institutional brokerage services – trading, custody, reporting and related services – many of which are not typically available to CS&Co retail customers. CS&Co also makes available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. CS&Co's support services described below are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. The availability to us of CS&Co's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

**Services that Benefit You.** CS&Co's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. CS&Co's services described in this paragraph generally benefit the client and the client's account.

**Services that May Not Directly Benefit You.** CS&Co also makes available to us other products and services that benefit us but may not directly benefit the client or its account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at CS&Co. In addition to investment research, CS&Co also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients' accounts; and
- assist with back-office functions, recordkeeping and client reporting.

**Services that Generally Benefit Only Us.** CS&Co also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

CS&Co may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. CS&Co may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. CS&Co may also provide us with other benefits such as occasional business entertainment of our personnel.

The availability of services from CS&Co benefits us because we do not have to produce or purchase them. We don't have to pay for these services, and they are not contingent upon us committing any specific amount of business to CS&Co in trading commissions or assets in custody. With respect to the

Program, as described above under **Advisory Business**, we do not pay SWIA fees for its services in connection with the Program so long as we maintain \$100 Million in client assets in accounts at CS&Co that are not enrolled in the Program. If we do not meet this condition, then we pay SWIA an annual fee of 0.10% (10 basis points) on the value of our clients' assets in the Program. In light of our arrangements with Schwab, we may have an incentive to recommend or require that clients maintain their accounts not enrolled in the Program with CS&Co based on our interest in receiving Schwab's services that benefit our business rather than based on the client's interest in receiving the best value in custody services and the most favorable execution of transactions. This is a potential conflict of interest. We believe, however, that our selection of CS&Co as custodian and broker is in the best interests of our clients. It is primarily supported by the scope, quality and price of CS&Co's services and not Schwab's services that benefit only us. We have adopted policies and procedures designed to ensure that our use of Schwab's services is appropriate for each of our clients.

### **Client Referrals from Brokers**

See the main section heading **Client Referrals & Other Compensation** (below) for disclosure.

### **Trade Aggregation**

Trade orders for client portfolios generated by SWIA's automated investment engine and as such we have nothing to disclose.

## **Review of Accounts and Reports on Accounts**

### **Review of Accounts**

Clients' portfolios are reviewed and approved when their accounts are initially invested. Thereafter, accounts are reviewed by a Financial Advisor based on client needs. More frequent reviews may be triggered by material changes in the client's financial situation or investment objectives and major market or economic events.

### **Reports on Accounts**

We do not provide written reports to clients, unless asked to do so. Clients will receive standard account statements from the qualified custodian or investment sponsor.

## **Client Referrals & Other Compensation**

### **Compensation for Client Referrals**

SIP may compensate for client referrals. All solicitors' agreements are in compliance with the Investment Advisers Act of 1940. In addition, all applicable federal and state laws will be observed. All clients procured by outside solicitors will be given full written disclosures by the solicitor, describing the terms and fee arrangements between SIP and the solicitor, prior to or at the time of entering into the advisory agreement.

## **Other Compensation Arrangements**

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us. These products and services, how they benefit us, and the related conflicts of interest are described above under **Brokerage Practices**. The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

## **Custody**

Under government regulations, we are deemed to have custody of a client's assets if the client authorizes us to instruct CS&Co to deduct our advisory fees directly from the client's account. This is the case for accounts in the Program. CS&Co maintains actual custody of clients' assets. Clients receive account statements directly from CS&Co at least quarterly. They will be sent to the email or postal mailing address the client provides to CS&Co. Clients should carefully review those statements promptly when received.

## **Investment Discretion**

SIP has discretionary authority to manage accounts enrolled in the Program. This discretionary authority is subject to the reasonable restrictions requested by Program clients and accepted by SIP, as applicable.

Subject to meeting minimum balance requirements, a client may also direct SIP to employ a tax-loss harvesting strategy in managing the client's taxable account. This means that ETFs in client's account(s) will be sold at a loss to offset a potential capital gains tax liability. The rebalancing and tax-loss harvesting opportunities may be affected by programming limitations and information clients make available to SWIA. In addition, clients may restrict up to three ETFs (limited to one per asset class or sub-asset class) in each Program account. It should be noted that ETFs designated for restriction by clients will be replaced with alternatives selected by SIP, in which case the client will forego the opportunity for tax-loss harvesting from this asset class. For more information about tax-loss harvesting and rebalancing strategies, please refer to the Program Disclosure Brochure.

## **Voting Client Securities**

SIP does not vote proxies and does not offer advice on corporate actions. As described in the Program Disclosure Brochure, clients enrolled in the Program designate SWIA to vote proxies for the ETFs held in their accounts. We have directed SWIA to process proxy votes and corporate actions through and in accordance with the policies and recommendations of a third party proxy voting service provider retained by SWIA for this purpose. Additional information about this arrangement is available in the Program Disclosure Brochure. Clients who do not wish to designate SWIA to vote proxies may retain the ability to vote proxies themselves by signing a special CS&Co form available from us. Questions about proxies may be made via the contact information on the cover page.

## **Financial Information**

SIP does not have any disclosure items in this section. An investment advisor must provide financial information if a threshold of fee prepayments is met or, if there is a financial condition likely to impair the ability to meet contractual commitments; or, a bankruptcy within the past ten years.

## Privacy Notice

### **NOTICE OF PRIVACY OF CONSUMER FINANCIAL INFORMATION**

Respect for clients' privacy is highly valued at Signature Intelligent Portfolios, LLC and its affiliated company Signature Estate & Investment Advisors, LLC ("we") and your privacy is important to us. We understand that the trust you have placed in us is conditional upon our proper handling of your personal information.

Federal law gives you the right to know what information is being collected about you and how the information will be used.

We collect non-public personal information about you from the following sources:

- Information we receive from you on applications or other forms;
- Information about your transactions with us, our affiliates, or others; and
- Information that you specifically have had your other professional advisors forward to us.

We do not disclose any non-public personal information about our customers or former customers to anyone, except as required by federal or state law, or as directed by you – our customer.

- Under the law, we may disclose all of the information we collect to companies that perform support services on our behalf as necessary to affect, administer, or process a transaction, or for maintaining and servicing your account.
- As directed by you, we will be working with your other professional advisors and we will provide information in our possession that is reasonably requested by other advisors.

We do not give or sell information about you or your accounts to any other company individual or group.

We restrict access to non-public personal information about you to those employees who need to know that information to provide products or services to you. We maintain physical, administrative, and technical procedural safeguards that comply with federal standards to guard your non-public personal information.

You do not need to call or do anything as a result of this notice. It is meant to inform you of how we safeguard your non-public personal information.

Should you have any questions regarding our privacy procedures, please feel free to contact us at (310) 712-2323.

## **Business Continuity Program**

Signature Intelligent Portfolios, LLC and its affiliated company Signature Estate & Investment Advisors, LLC seek to provide uninterrupted client service. We believe the stability of our business practices, as well as our technology systems, is vital to earning your trust, therefore we make every effort to provide uninterrupted service through a Business Continuity Plan aligned with rigorous SEC and FINRA requirements.

In the event of a natural or unnatural disaster that interrupts our normal business operations at our corporate headquarters at 2121 Avenue of the Stars, in Los Angeles, California; our comprehensive Business Continuity Plans include but are not limited to the following:

- Pre-defined alternate worksites and communications systems for all business critical functions.
  - 2010 Main St., Suite 220, Irvine, CA 92614 Ph 949-705-5188 or 800-472-1066 Fax 949-705-5199
  - 3452 E. Foothill Bl., Suite 1140, Pasadena, CA 91107 Ph 626-795-2944 Fax 626-795-2994
  - 1650 Tysons Blvd., Suite 1575, Tysons Corner, VA 22102 Ph 703-940-3000 Fax 703-738-2259
  - 1815 Via El Prado, Suite 100, Redondo Beach, CA 90277 Ph 310-712-2322 Fax 310-712-2377
- Multiple data recovery backup systems.
- Various methods of communicating with and providing service to clients via the Internet, local offices and automated telephone forwarding services.
- Annual employee awareness and Business Continuity training.

While no contingency plan can eliminate all risk of service interruption or temporarily impeded account access, we continually assess, test, and update our Plan to mitigate all reasonable risk.

If we find it necessary to temporarily move our operations, we will attempt to notify you. Please understand that this may take from 24 to 48 hours or longer.

Please refer to the Business Continuity Programs of your custodian for additional key information. A complete copy of our Business Continuity Plan may be viewed in our office during regular business hours.

Sincerely,



Brian D. Holmes, MS, CFP®, CMFC, AIF®  
President, CEO